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EPA Region 5 Records Ctr.



March 10, 2003

Ms. Rosemarie Cazeau Illinois Attorney General's Office 188 W. Randolph Street Chicago, IL 60601

Dear Rosemarie:

I am writing to you just as "Joe Citizen" and business owner of Tricon Industries, Inc. for the purpose of asking you to accurately consider the factual information that seems to have escaped consideration in evaluating Tricon's position in the Ellsworth Park water contamination case.

Tricon has been a member of the Downers Grove community for over 40 years. We believe we have displayed good corporate citizenship. I have enclosed a copy of the Proclamation issue by the Downers Grove Council in recognition of our 50th Anniversary a few years ago. I am not aware of any other company (although there may be someone) in the Industrial Park receiving this type of recognition. Coming from that high position to now having our name sullied extensively in our community due to dissemination of incorrect information in various public forums is a great concern to me.

Tricon is a family owned company with our family members living in the Downers Grove area since 1960 (our two daughters now live in Naperville and Glen Ellyn). We do care about our community. Clean drinking water is important to everyone, but we do not believe we are a contributor to the problem.

I have enclosed several other pieces of documentation that you probably have, but that we believe pertinent but incorrect.

Exhibit #1 is the narrative regarding testing that took place at the leased facility on Janes Avenue (not our Wisconsin Avenue plant).

Exhibit #2 is the report from the USEPA regarding a former employee of Principal Manufacturing Company, which, in our mind, clearly establishes responsibility.

Exhibit #3 references the Janes Avenue facility, which we lease. The documentation indicates Tricon is the owner. This is incorrect.

Exhibit #4 is a copy of our Lease Agreement. Based on this contract, preexisting conditions should not be attributable to Tricon. The building owner accepted these conditions at the time of the lease.



Exhibit #5 shows noted corrections. The interpretations of our manifests were chemically incorrect. The TCE noted was actually the TCA noted below. The year 1998 was probably simply a typo, as the correct year was 1989.

As you can tell, my concern regarding our reputation in our community is significant. We believe we have handled solvents responsibly over the years and do not want to lose our good standing in the community because of inaccurate factual information.

Please feel free to call me if you so desire. Your positive response to this letter will be very much appreciated.

Very sincerely,

Tagh W I wille Ralph W. Grandle

President

RWG/dl

Encl.

PROCLAMATION

WHEREAS, Tricon Industries, a privately-held company still run by descendants of its founders, is one of only a few companies in the world specializing in insert molding; and

Whereas, this industrial process efficiently combines plastic and metallic components without the need for special fasteners or adhesives; and

Whereas, Tricon's insert-molded connectors, interconnect devices and custom switches are found in a variety of automobiles, electronics and appliances; and

Whereas, the past fifty years have seen Tricon develop from a small metalforming shop specializing in contact points and jewelry-related items into an engineering driven, product-design partner to major corporations such as General Motors and Motorola; and

Whereas, today, 1994 projected sales at Tricon exceed \$35 million; and

Whereas, the company continues to add computer aided design (CAD) and computer integrated manufacturing (CIM) capabilities, and is ambitiously planning to expand operations further during the next fifty years;

Now, Therefore, I, Betty M. Cheever, Mayor of the Village of Downers Grove, do hereby proclaim Sunday, May 1, 1994 to be **TRICON INDUSTRIES DAY** in Downers Grove to commemorate its fiftieth year of service to its customers and its community.

Mayor Betty M. Cheever

Dated this 1st day of May 1994 at Downers Grove, Illinois.



Ellsworth Industrial Park
Phase II Preliminary Investigation Report
Section: 5

Revision: 1 Date:19 August 2002 Page: 5-10 of 13

building at 4,500 ug/kg. Low levels (<1 ug/L) of PCE/TCE were detected in shallow groundwater south of the building; however, PCE was detected in the bedrock groundwater at this facility at 12 ug/L. Based on solvent levels in soil and groundwater at this property, probable PCE source materials are present on the Scot property. Additional work will be required to identify the specific source location, extent, and magnitude of PCE at this facility.

Tricon- Little background information is available for the leased James Avenue Tricon facility other than U.S. EPA information, which indicates potential surface disposal of chlorinated-solvents may have taken place. Shallow soil sampling in the suspected discharge area indicates TCE is present at levels between 220,000 ug/kg (7.5 ft bgs) and 500,000 ug/kg (12 feet bgs). These are the highest TCE soil detections documented in the industrial park at this time. Little shallow groundwater data is available for this area since the site is located where significant thicknesses of low-permeability silty clay is present between the facility and the bedrock aquifer. Based on the TCE levels at this site, probable source materials are present. Additional work will be required to evaluate the extent and magnitude of TCE in soil at this facility and to evaluate potential migration pathways to the bedrock aquifer. This should also include other Tricon facilities within the industrial park as well based on this companies documented large historical solvent use.

5.4.2 Potential Source Facilities

A potential-source facility is defined as facilities where there is a possibility that source materials are present based on analytical data and background information gathered to date. These include facilities where applicable standards have been exceeded but not necessarily at levels indicative of a source (although one may be nearby) or where complicating factors such as groundwater flow direction or surface drainage patterns increase uncertainty. These facilities will require additional investigation to determine if probable source materials that have contributed to the chlorinated-solvent groundwater plume are present. Based on data collected to date, the following facilities are identified as potential sources:

• Ames- Background information indicates this facility was a generator of hazardous waste and was in operation between 1962 and 2000. A solvent degreaser was present at this facility. Previous investigations related to property transactions indicate the presence of PCE/TCE in soil and groundwater. Samples collected from two shallow wells on the west side of the building indicate PCE in groundwater between 42 and

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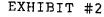
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CONFIDENTIAL





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5 CHICAGO, ILLINOIS

ENFORCEMENT CONFIDENTIAL

DATE: December 16, 2002

SUBJECT: Downers Grove Contaminated Groundwater initiative

FROM: Joseph A. Malek SE-5J Phone 312-353-2007

TO: Carol Ropski, PEss Stave Paryan, OSC Tom Krueger, ORC Tom Crause, ISPA

CC: Bill Messenger, EESS

To keep you current on the status of the current investigation aimed at seeking sources of groundwater contamination in the area of the Ellsworth subdivision, you should know the following:

A former employee of Principal Manufacturing Company was located and interviewed last week. He told me that during 1976 a Mr. Edward Leonard, sole owner of a Principal Manufacturing Company which occupied a portion of the building located at 5401 Janes, died being survived by his widow whose name he could not recall. The widow enlisted the help of one of her relatives (maybe a nephew) who lived \$300mewhere down in southern U.S., waybe Mississippi and who was a lumber salesman to help her run the place. This employee said,

Whe tried to manage our place all the way from down there and only came up maybe one or twice a month. Our place really was going to hell after Ed's death and we had to begin cut costs. It was during that time that I saw my coworkers dump out 55 gallon drums of waste oils end lubricants right out the north exit door near one of our service doors. I would have to say that this dumping may have occurred over at least two years, maybe longer.

We probably took delivery from a company called Maggie Brothers which was then located somewhere on the east coast

Page 1 of 3

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CONFIDENTIAL

of 2 - 3 drums each month of TCE. We also got <u>Hardout</u> from a company called Hanksteater or something like that and hydraulic and machine oils from other companies which were stored inside the loading dock area. On the far southwest side of our plant - we probably only then occupied one-fourth of the entire building - we had a degreasing pit which stood maybe about 2-3 feet above the floor. Employees would bring their work to the degreaser and insert their work into it to clean it off.

It think it was for maybe 4 or 5 years that Ed's wife ran the place before it was sold to the current owner of Principal Manufacturing Company, a Mr. Bennett. Bennett operated Principal at the same locating until about the late 1990's when he moved the operatics to Broadview, Illinois. Ed, his widow and Mr. Bennett were leasing the space from a guy named, William Helwig who used to come personally to pick up his rent checks.

Mafter Ed's death in order to save money, I guess, I saw two managers order Mexican staff at Principal to drain the degreaser pit into 55 gallon drums, roll the full drums to the door and just dump the liquid out unto the ground. I protested more than once to them put I guess they just kept doing it. It was not long after this dumping that I happened to comment while eating lunch at an area where door appeared to be devoid of grass. This barren area was about 6 feet wide, 18 feet long and sloped northerly toward a small swale but I do not know where the surface water drained from there. I also suspect that they also dumped this stuff down into the sewer after they got tired of my complaints. Everyone knew that the stuff that they were dumping was killing it.

End of interview.

Once the interview was concluded, this employee and I drove to the building that Principal occupied in the Ellsworth subdivision. The facility is now occupied by Tricon which has its principal offices around the corner on Wisconsin Avenue. There the employee pointed out the door and ground area where the dumping took place. Later that day, with Stove's concurrence, I enlisted the help of Keith Lesniak to stake and mark the area in anticipation of some sampling taking place there. Before leaving I talked with both William Helwig and a Tricon representative about site access but no definite arrangements were made for the

Page 2 of 3

DEC-17-2002 11:01

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CONFIDENTIAL

testing.

I had an occasion to visit with Mr. Hennett at his Broadview office. He has tentatively agreed to furnish me with his first lease at the James Avenue facility and with my asset purchase agreement. Some of his current employees are carryovers from Ed Leonard's operations.

Information on although

END OF REPORT

Page 3 of 3

TOTAL P.04

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EXHIBIT #3

ELLSWORTH INDUSTRIAL PARK SITE f/k/a DOWNER GROVE GROUNDWATER ASSESSMENT PRP RESPONSE SUMMARY TABLE

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	Period of Operations
Principal Manufacturing Corporation Paul Barnett, President 2800 S. 19 th Ave. Broadview, Illinois 60153 (708) 865-7500 Fax: (708) 865-7632 Mr. William Hellwig 9 S 456 Millbrook Drive Downers Grove, Illinois 60516			**	Owned and operated at a portion of Tricon's facility prior to purchase by Tricon.

L NOT OWNED BY TRICON

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	Period of Operations
Precision Brand Products, Inc. 2250 Curtiss Street Downers Grove, IL 60515 (630) 969-7200 Respondents: Michael J. Hughes Neal, Gerber & Eisenberg Two North La Salle Street Chicago, II. 60602-3801 (312) 269-8064 Larry A. Franczyk, Vice President and General Manager 2250 Curtiss Street Downers Grove, IL 60515 (630) 969-7200	No IEPA letter sent. U.S. EPA CERCLA 104(e) sent: 1/30/02 Date received by PRP: 2/4/02 Extension to: 3/15/02 Response date: 3/25/02	U.S. EPA Response: DuPage Mfg. Co., which was purchased by Precision Brand Products in 1980, used TCE from approximately 1970 through 1978, and PCE from approximately 1978 through 1979. Both products were used in a liquid state for vapor degreasing purposes. Product was stored in drums and later in a 500-gallon AST. In the 1970s, non-contact cooling water from the degreasing operation was at times discharged to the floor drains or sumps associated with the sanitary sewer system. Product was treated in a recycling still that was installed in approximately 1976. Spent solvents and sludges were transported off-site for disposal or recycling. Precision Brand Products, Inc., uses non-hazardous pretroleum-based products in its processes.	U.S. EPA Response: Permits: None noted. Spills: In the mid-late 1990s, a supplier's truck ruptured diesel fuel tank in the east parking lot. The cleanup was performed by the Downers Grove Fire Department. Facility Investigations: None noted.	Precision Steel Warehouse: 1965-1978 Precision Brand Products, Inc. (subsidiary): 1978 - present

Response Summary: Precision Brand Products, Inc., currently owns and occupies the property at 2250 Curtiss St. Precision Steel Warehouse, Inc., purchased the property from Rudolph Ellsworth in 1965, and conveyed the property to its subsidiary, Precision Brand Products, Inc., in 1978. The building on the property was constructed during 1966-1967. Precision Brand Products, Inc., currently cuts metal coils and distributes hose clamps, and performed thread-rolling operations involving water based coolants between 1971 and 1998. Precision Brand Products, Inc., has never conducted manufacturing operations using chlorinated solvents. In 1980, Precision Brand Products, Inc., purchased certain assets and assumed certain liabilities of DuPage Mfg. Co, a subsidiary of Precision Steel Warehouse, which at that time occupied space in the same building with Precision Brand Products, Inc. DuPage Mfg. Co. conducted stamping and assembly of hose clamps. In the mid-1990s, Precision Steel Warehouse entered into a de minimis settlement with U.S. EPA regarding the DuPage Mfg. Co. transactions that occurred in the 1970s with the American Chemical Services site in Griffith, IN.

36. Maintenance by Lessee During the terms of this lease and any extension thereof, Lessee covenants and agrees to maintain and/or replace, at lessee's sole expense the interior of the leased space including walls, floors, incoming and internal utilities systems, lighting, heating and air conditioning equipment, decorating and any other items that may arise except those specifically stated in item #35 Maintenance by Lessor. In addition, Lessee covenants and agrees to keep the demised premises free from all hazardous material, from the original lease date of October 23,1989, so as not to violate any state and/or federal laws. Nevertheless, Lessee shall have no responsibility whatsoever for any preexisting conditions or for matters set forth and described in the Executive Summary of the Phase I Environmental Site Assessment prepared by Northwest Envirocon, inc. on June 14, 1996. Lessee also agrees to landscaping exterior, snow removal and keep the premises clean from trash and debris.

PRP Name	Correspondence	Use/Generation of Chlorinated	Permits/Spills/Facility Investigations	Period of
Contact Information	Information	Solvents		Operations
Tricon Industries, Inc. 2325 Wisconsin Avenue Downers Grove, IL 60515 Respondent: Tricon Industries, Inc. Corporate Headquarters Ralph Grandle, President 1600 Eisenhower Lane, #200 Lisle, IL 60532 (630) 964-2330 Fax: (630) 829-5125	IEPA letter sent: 10/3/01 Response date: 10/18/01 U.S. EPA CERCLA 104(e) sent: 3/29/02 Response date: 4/19/02	IEPA Response: A limited amount of hazardous chemicals are stored at the facility. PCE is used in the degreasing process. Waste PCE is shipped off-site for recycling. Between 1983 and 1990, Tricon Industries, Inc., generated waste TCE and PCE, according to the waste manifests provided with the response. Between 1992 and 1997, Tricon Industries, Inc., purchased an average of about 10 drums of PCE per year from Parko, Inc., or Finishing Equipment, Inc., for use in its degreaser. U.S. EPA Response: PCE has always been purchased in 55-gallon drum quantities and stored in two (2) drums of new solvent and two (2) or three (3) drums of used solvent. Used PCE was either recycled or fuel blended off site by the supplier or a waste disposal company. All solvent was maintained indoors in an area with no floor drains. Until 1998 Tricon Industries, Inc., also used 1,1,1-TCA in small quantities as a cold batch degreaser. Two (2) to three (3) drums of new and used solvent were the maximum quantities on hand. Employees of the cleaning department are certified class	IEPA Response: Permits: 1) Since at least 1984, Tricon Industries, Inc., has held an IEPA Operating Permit to operate an open top vapor degreaser. The most recent was a lifetime permit issued April 25, 2001. Solvent use is not to exceed 0.5 tons/month or 4.6 tons/year. PCE is the only solvent to be used in the degreasing process. 2) Tricon Industries, Inc., is permitted by the Downers Grove Sanitary District to discharge industrial wastewater into the sanitary sewer system, subject to compliance with pretreatment standards. Spills: There have been no leaks, spills or releases of hazardous materials at the facility. There has been no soil removal from the facility. Facility Investigations: None noted. U.S. EPA Response: Permits: Since at least 1985, Tricon Industries, Inc., has been permitted to discharge industrial wastewater into the Downers Grove Sanitary District sewer system. The current permit was issued on October 15, 2000. Spills: None. Facility Investigations: The Downers Grove Sanitary District conducts routine annual site visits. Tricon Industries, Inc., has incurred several non-chlorinated solvent related permit violations, and has addressed them appropriately. The most common violation was late submittal of self-monitoring reports.	1963 - present

				
PRP Name	Correspondence	Use/Generation of Chlorinated		Period of
Contact Information	Information	Solvents	Permits/Spills/Facility Investigations	Operations

Tricon Industries, Inc., Continued	"K" wastewater treatment works operators, trained in handling, storage, and use of solvents.	In October 2001, a Phase I ESA was conducted at the facility, and was followed up with a Phase II ESA in December 2001. Four soil borings were conducted to address areas of concern. Two soil samples revealed	
	According to a source other than this response, Tricon Industries, Inc., released 10,992 lbs. of TCE between 1987 and 1992.	PCE above laboratory detection limits, but below soil remediation objective values. Though elevated levels of arsenic were detected in all four soil samples, the assenic concentration was considered background and not associated with historical operations on the property.	
	Solvent Suppliers: 1963-1993: Parco Products	No further investigation was recommended.	
	No records are available regarding quantities purchased. 1994-present: Finishing Equipment,		
	Inc. 86 drums - 4,730 gallons 2000: Detrix Corp.		
	U.S. EPA #ILD07442938 4 drums - 220 gallons 2000-present: Heritage - Crystal		
	Clean, LLC U.S. EPA #INR000006536 7 drums - 385 gallons		
	Waste solvent handlers: 1963-1983: American Chemical Service		
	U.S. EPA #IND016360265 No records regarding quantities are available for prior to 1983.		
	1983-1990: American Chemical Service 64 drums - 3,520 galions		
	1990-1992: Avganic Industries U.S. EPA #WIJ000808824 15 drums - 825 gallons		

PRP Name	Correspondence	Use/Generation of Chlorinated	Permits/Spills/Facility Investigations	Period of
Contact Information	Information	Solvents		Operations
Tricon Industries, Inc., continued:		Waste solvent handlers, continued: 1993-1999: Hydrite Chemical Co. U.S. EPA #WID000808824 42 drums - 2,310 gallons	·	

Response Summary: <u>IEPA Response</u>: Tricon Industries, Inc., purchased the facility in 1959 and has been operating there since 1963. There were no prior operators at the property. Tricon Industries, Inc., manufactures insert injection molded componentry and performs metal stamping, assembly, plating and finishing operations. Plating/finishing is the only process that consumes hazardous materials, which are used in vapor degreasing, plating, and wastewater treatment. The facility does not have solid waste management units. All hazardous and non-hazardous wastes generated by the finishing department are collected in appropriate containers and removed by Heritage Crystal-Clean for disposal or recycling. Tricon Industries, Inc., performs quarterly wastewater sampling for pH, cyanide, copper, nickel, silver and zinc.

<u>U.S. EPA Response</u>: Prior to Tricon Industries, Inc.'s, occupation of the facility, the property was vacant land. No storage tanks of any kind have ever existed on the property. All floor drains in the cleaning department empty into the wastewater treatment pit. Floor drains in the vapor degreaser area are plugged to contain a spill of solvent, should one occur. There are no monitoring wells on the property.

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	Period of Operations
White Lake Building Corporation 2537 Curtiss Street Downers Grove, IL 60515	No IEPA letter sent. U.S. EPA CERCLA 104(e) sent: 3/29/02	see Ames Supply Company, which leases the property owned by White Lake Building Corporation.	see Ames Supply Company, which leases the property owned by White Lake Building Corporation.	
	Date received by PRP: unknown			